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Eagle Signal Controls

A Mark IV Industries Company

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736 Federal Street
Davenport, Iowa 52803
(319) 328-2055

August 29, 1988

Mr. Mike Sanderson
Chief, RCRA Branch
U.S. Environmental Protection Agency
Region VII
726 Minnesota Avenue
Kansas City, KS 66101

Dear Mr. Sanderson:

Per our letter to you of July 12, 1988 (which responded to the Notice of Violation of 7/5/88), I am sending to you a copy of our Contingency Plan. All copies will be distributed as mentioned in the plan.

By this letter, all citations of 7/5/88 have been corrected.

If you have questions, please call me at 319-328-2055.

Sincerely,



John DeGryse
Plant Manager

RCRA



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/jc

RECEIVED

SEP 02 1988

IOWA SECTION

RECEIVED

SEP 02 1988

USEPA, RCRA Branch

CONTINGENCY PLAN
EAGLE SIGNAL CONTROLS
736 FEDERAL STREET
DAVENPORT, IA 52803
IAD051001337

Primary Coordinator

Richard Erickson
[REDACTED]

All redactions Ex. 6 PII

Plant: (319) 328-2053
[REDACTED]

Assistant Coordinator #1

Arlee Tripaldi
[REDACTED]

Plant: (319) 328-2054
[REDACTED]

Assistant Coordinator #2

John DeGryse
[REDACTED]

Plant: (319) 328-2055
[REDACTED]

Fire Department

911

Ambulance

911

Police

911

The contract security service, Per Mar, makes two rounds a night throughout the building.

In the event of an emergency, the Eagle Signal page system could be used. Dial 2068 and page any of the Coordinators. The page system could also be used to evacuate all of the Eagle Signal employees. Should an emergency arise at other than working hours, the guard will call the Coordinators, in the order listed above. He will then be informed on further action to be taken.

Since maintenance personnel have received and will continue to receive training in the use of fire equipment and handling of waste, they will be our primary defense team in case of fire or spill. They will be under the supervision of the Primary Coordinator, or in his absence, the Assistant Coordinators.

The duties of the Primary Coordinator will be:

1. Contact person to answer questions and make decisions on course of action of hazardous disposable waste products.
2. Along with Assistant Coordinators, will notify employees involved with any new hazardous waste material.
3. Identify and assign a new hazardous waste to a proper category.
4. Process all paperwork for handling and disposal of new waste.
5. Will contact EPA or other qualified source if in doubt of category or disposal.
6. In emergency situation, supply information for best handling the situation.

The Assistant Coordinators have been appointed so one or more coordinators will be present should an emergency arise. In the event of an emergency, the emergency coordinator or his assistant must do the following:

1. Activate internal facility alarms or communication systems to notify all personnel in the facility.
2. Notify appropriate State or Local agencies with designated response roles if help is needed.
3. Whenever there is a release, fire or explosion, must identify the character, exact source, amount and real extent of any released material. He may do this by observation, review of facility records or manifests or chemical analysis.
4. Assess possible hazards to human health or environment. Must consider direct and indirect effects of the release, fire or explosion.
5. If the determination is made that there is a hazard to human health or the environment, emergency coordinator must:
 - a. Determine if evacuation is necessary. If he feels it is, he must immediately notify local authorities to determine which local areas should be evacuated.
 - b. Must notify either the government official designated as the on-scene coordinator for that area, or the National Response Center using their 24 hour toll free number 800-424-8802. The report must include:
 1. Name and telephone number of reporter.
 - **2. Name and address of facility.
 3. Time and type of incident.
 4. Name and quantity of material(s) involved and to the extent, if known.
 5. Extent of injuries, if any.
 6. Possible hazards to human health or environment outside the facility.

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6. During emergency, must take measures necessary to ensure fires, explosions and releases do not occur or spread to other hazardous waste at the facility.
7. If facility stops operations, emergency coordinator must monitor for leaks and pressure buildup.
8. After emergency, Emergency Coordinator must provide for treating, storing, or disposing of recovered waste, contaminated soil or surface water, etc.
9. Emergency Coordinator must ensure that, in the affected areas of the facility:
 - a. No waste that may be incompatible with the released material is treated or stored or disposed of until cleanup procedures are completed; and
 - b. All emergency equipment is cleaned and fit for its intended use before operations are resumed.
10. The owner or operator must notify the Regional Administrator and appropriate State and local authorities that the facility is in compliance with #9 (a) and (b) before operations are resumed in the affected area(s) of the facility.
11. The owner or operator must note in the operating record the time, date, and details of an incident that requires implementing the contingency plan. Within 15 days after the incident, he must submit a written report on the incident to the Regional Administrator. The report must include:
 - a. Name, address, and telephone number of owner or operator.
 - b. Name, address and telephone number of facility.
 - c. Date, time and type of incident.
 - d. Name and quantity of material(s) involved.
 - e. The extent of injuries.
 - f. Assessment of actual or potential hazards to human health or environment.
 - g. Estimated quantity and disposition of recovered material that resulted from the incident.

Location of Fire Extinguishers and Spill Control material, Fire Alarms

Red poles designate the areas where the fire extinguishers are hung.

First Floor

Fire Extinguishers

- 1 - post by D. Strobbe's desk
- 1 - near shear
- 1 - Paint Department
- 1 - Punch Press Department
- 1 - Credit Union
- 2 - Near Personnel
- 2 - Drill Press area
- 1 - Saw Room
- 1 - Paint Storage Room
- 2 - Plating area
- 1 - Acid storage room
- 1 - East exit door
- 1 - By Foreman's office
- 1 - Toolroom
- 1 - Short Run
- 3 - Maintenance
- 2 - Mills
- 1 - S.W. Exit Door
- 3 - High Bay area

FIRE ALARMS (Fire Pulls)

- 1 - S.W. exit door on Federal Street
- 1 - By ladies' restroom
- 1 - Center stairway

Spill Controls Material

- Oil Dry by overhead doors near Plating.
- Oil Dry - Acid Storage Room
- Oil Dry - High Bay area
- PIGS - Mills area

Emergency Exit Maps

- 1 - By Center Stairway

RIGHT-TO-KNOW MAPS (designating hazardous waste locations)

- 1 - Across from D. Strobbe's desk (1st floor annex)
- 1 - Outside foreman's area.

Second Floor

FIRE EXTINGUISHERS

- 1 - Wall by Center Stairway Door. (across by Silk Screen)
- 3 - Print Shop
- 1 - Outside Shipping office
- 1 - Dock
- 1 - South Stockroom
- 1 - North Stockroom (near Shipping)
- 3 - Traffic Signal assembly (South Side) (Poly Signals)
- 1 - Stockroom north of poly traffic signal assembly
- 3 - North side stockroom - new wing
- 1 - Signal Assembly - South Side - new wing
- 1 - Silk Screen area in new wing

FIRE ALARMS (Fire Pulls)

- 1 - Center stairwell door.
- 1 - Post going to dock
- 1 - East exit door - main factory building.

SPILL CONTROL MATERIAL:

Box of "PIGS" in Silkscreen Supply Area.

EMERGENCY EXIT MAPS

Center Stairway - factory main building.

RIGHT-TO-KNOW MAPS (designating hazardous waste locations)

Outside Print Shop and in the Shipping area (1 map)

These maps are also located in three-ringed binders on Don Strobbe's desk, the Foremen's office, in the Print Shop and in the Toolroom.

Copies of this plan will be given to the Davenport Fire Department, Davenport Police Department, St. Luke's Hospital, Mercy Hospital and Davenport Medical Center. A chemical list is accompanying this plan.